

To: Daly, Carl[Daly.Carl@epa.gov]; Jackson, Scott[Jackson.Scott@epa.gov]; Laumann, Sara[Laumann.Sara@epa.gov]; Distler, Kenneth[DISTLER.KENNETH@EPA.GOV]; Razzazian, Christopher[Razzazian.Christopher@epa.gov]

From: Russ, Timothy

Sent: Tue 3/5/2013 5:17:15 PM

Subject: NPL Project Preliminary DEIS (SW Wyoming- BLM) Issue - Permitting of Drill Rigs to Address General Conformity Exemption (ADDITIONAL INFO.)

[8122per.pdf](#)

[9080per.pdf](#)

[9112per.pdf](#)

[13400ana.pdf](#)

[13400offset.pdf](#)

[13400per.pdf](#)

[Interim Permit Policy.pdf](#)

[J-nichols-Drill-Rig-petition-EPA-response-6-2-09.pdf](#)

Hi Everyone,

As an outgrowth of our meeting yesterday, I have amended the original "Issues/Background" email below to address the group's request for additional information. Please see the revised information below as highlighted in Blue.

Thanks!

Tim

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From: Russ, Timothy

Sent: Thursday, February 28, 2013 12:53 PM

To: Daly, Carl; Jackson, Scott; Razzazian, Christopher; Distler, Kenneth; Laumann, Sara

Subject: NPL Project Preliminary DEIS (SW Wyoming- BLM) Issue - Permitting of Drill Rigs to Address General Conformity Exemption

Hi Everyone,

I wanted to send this email with expressed concerns and background information for a meeting I will attempt to schedule for early next week.

Ex. 5 - Deliberative Process

Typically, **stationary sources** that are permitted by the State in the Upper Green River Basin (UGRB) ozone nonattainment area, are permitted under WAQSR Chapter 6 and the State's 2008 Interim Policy for sources in the UGRB. In order to meet the requirements of WAQSR Chapter 6 and the 2008 Interim Policy, the permit requestor typically elects to fully offset the emissions from the source; please see the following State permitting information from Cole Anderson of WYDEQ:

"Attached are the permit examples Tina referenced in her last email. Two documents, **13400ana.pdf** and **13194ana.pdf**, are final analyses that were drafted for oil and gas sites in the non-attainment area. We organize our analyses (a.k.a. statement of basis) to

address the proposed project and applicable regulations in the beginning. Next we list our proposed permit conditions. Finally, we include emissions tables and a table showing the offset calculation for the proposed project. Also attached to the email are electronic versions of spreadsheets that we generate for each application. The spreadsheet is one large table of all permitting actions for the company that involve offsets. This spreadsheet and the Division's analysis are published for public comment."

7. That emissions shall be limited as follows:
 - i. Total actual annual NO_x emissions from all drill rig engines and boilers associated with the EnCana Oil & Gas (USA) Inc. Drill Rig Fleet shall not exceed 282.0 tons per year (tpy) NO_x.
8. Total actual annual NO_x emissions from all drill rig engines and boilers associated with the SWEPI, LP Drill Rig Fleet shall not exceed 140 tons per year (tpy) NO_x.
8. Total actual annual NO_x emissions from all drill rig engines and boilers associated with the Questar Market Resources Drill Rig Fleet shall not exceed 384.1 tons per year (tpy) NO_x for 2009, 381.9 tpy NO_x for 2010, 375.1 tpy NO_x for 2011, and 152.2 tpy NO_x for 2012.

Ex. 5 - Deliberative Process

In addition, and for reference, attached is the State's 2008 Interim Policy that requires offsets for permits in the UGRB:

15. This permit only authorizes drill rig engines and replacement engines to remain at any pad for less than twelve (12) consecutive months.

The fact that non-road engines (such as those on drill rigs) can be permitted by States to restrict mass emissions, hours of operation, and such was detailed in our letter to WEG with regard to their request that EPA require Colorado to permit drill rig engines. Please see the last page of the following .pdf file of our response to WEG:

17. That should drill rig engine(s) meet the definition of a stationary source, SWEPI, LP shall comply with all state and federal regulations applicable for stationary sources.

B.) Currently, the State issues "voluntary" permits to operators for their combined drill rig fleets operating in the UGRB.

Cole Anderson (WYDEQ) had previously sent me three examples of State-issued drilling rig fleet "voluntary" permits to look at:

17. That should drill rig engine(s) meet the definition of a stationary source, SWEPI, LP shall comply with all state and federal regulations applicable for stationary sources.

Ex. 5 - Deliberative Process

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C.) Questions for discussion:

Ex. 5 - Deliberative Process

- 3.) The three “voluntary” drill rig fleet permits provided above by the State indicate the drill rig fleets are being permitted under WAQSR Chapter 6, Section 2,

Ex. 5 - Deliberative Process

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4.)

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Thanks for reading all of the above and please let me know if there are any questions.

Tim

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